

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW HAMPSHIRE

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United States of America

v.

Alkis Nakos

No: 1:14-cr-93-LM

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PARTIALLY ASSENTED-TO MOTION BY DEFENDANT ALKIS NAKOS'S TO  
EXTEND SUPPRESSION MOTION DEADLINE

NOW COMES Defendant Alkis Nakos, by and through his counsel, Robert S. Carey, Orr & Reno, P.A., and moves this Court to extend through January 12, 2015, the deadline for filing suppression motions for the following reasons:

1. Nakos filed two suppression motions on January 7, 2015. At the time, there were several pending motions to extend filed on behalf of co-defendants, Koustas, Blevens and Horne. The motions sought a one week extension of their suppression motions deadline. The Court has granted those motions, resetting the motions deadlines for those defendants.

2. As noted in Koustas's motion, the Government has recently produced 18 CD's containing further discovery. The additional time will allow counsel for Nakos to determine whether to file additional motions based on these materials. It will also ensure that the two motions that were filed on behalf of Nakos, while other motions to extend were pending, are considered timely.

3. The Government, through AUSA Terry Ollila, assents to this motion.

Counsel for co-defendants, Koustas, Fowle and Blevens assent to this motion. At this writing, counsel has not heard from counsel for the other co-defendants.

WHEREFORE, Mr. Nakos respectfully requests this Court:

- A. Grant this Motion;
- B. Extend the time in which Nakos must file all suppression motions to January 12, 2015; and
- C Grant such other relief the Court deems necessary and just.

Respectfully submitted,

ALKIS NAKOS

By his Attorney,

Dated: January 9, 2015

/s/ Robert S. Carey  
Robert S. Carey, NH Bar #11815  
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CERTIFICATE OF SERVICE

I hereby certify that on January 9, 2015, a copy of the within Notice was Electronically Served upon all counsel of record and Conventionally upon Alkis Nakos.

/s/ Robert S. Carey  
Robert S. Carey, NH Bar #11815

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